

# EXHIBIT E

**Exhibit E to the Declaration**

<b>Document Title/ECF No.</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Exhibit 1 to Letter Dated September 16, 2024 [ECF No. 383]	Exhibit 1 is an email from Save On SP, LLC's ("SaveOnSP") President, Jody Miller, to an employee of Johnson & Johnson (with its affiliates, "J&J"). The email contains marketing information about SaveOnSP intended only for potential clients, comprising confidential business information. <i>See</i> ECF No. 383 at Ex. 1.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection
Letter Motion Dated September 26, 2024 [ECF No. 391]	Letter motion characterizes and quotes from the contents of documents produced by SaveOnSP to J&J during discovery that contain information about SaveOnSP's business and marketing practices,	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection

	comprising confidential business information. <i>See</i> ECF No. 391.				
Exhibit 1 to Letter Dated September 26, 2024 [ECF No. TK]	Exhibit 1 is an email chain between employees for Express Scripts, Inc. (“ESI”) and Accredo Health Group (“Accredo”), discussing SaveOnSP’s business practices for advising patients receiving copay assistance, comprising proprietary business information <i>See</i> ECF No. 391 at Ex. 1.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP’s proprietary business information.	No	No objection
Exhibit 2 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 2 is an email chain between employees for ESI and SaveOnSP and a health plan client, discussing market research SaveOnSP and Accredo did, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 2.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP’s proprietary business information.	No	No objection
Exhibit 3 to Letter Dated September 26, 2024	Exhibit 3 is an email chain between employees for ESI and Accredo, discussing SaveOnSP’s business practices for advising	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP’s proprietary business information.	No	No objection

[ECF No. 391]	patients receiving copay assistance, comprising proprietary business information <i>See</i> ECF No. 391 at Ex. 3.	information be disclosed to competitors and other market participants.			
Exhibit 4 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 4 is an email chain between employees for ESI and Accredo, discussing SaveOnSP's business practices for advising patients receiving copay assistance, comprising proprietary business information <i>See</i> ECF No. 391 at Ex. 4.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection
Exhibit 7 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 7 is the deposition transcript of SaveOnSP employee Ayesha Zulqarnain, which describes SaveOnSP's business practices, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 7.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	Yes. <i>See, e.g.</i> , ECF No. 287 at Ex. 3.	No objection
Exhibit 8 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 8 is SaveOnSP's Supplemental Responses & Objections to J&J's Interrogatories Nos. 2, 17, 18, and 20. SaveOnSP's R&Os contain confidential	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information and strategy	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's	No	No objection

	information about SaveOnSP's business practices, specifically its confidentiality policies and interactions with drug manufacturers, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 8.	be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 9 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 9 is a daily "checklist" of SaveOnSP employee Ayesha Zulqarnain. The checklist contains information about SaveOnSP's business practices, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 9.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection
Exhibit 10 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 10 is an internal SaveOnSP spreadsheet containing patients' names and information about SaveOnSP's interactions with them, comprising proprietary business information and confidential patient health information. <i>See</i> ECF No. 391 at Ex. 10.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.  Patients would also be harmed by the disclosure	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information and of patients' confidential health information.	No	No objection

		of their confidential health information.			
Exhibit 13 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 13 is an internal SaveOnSP email chain about SaveOnSP's marketing and communication strategy, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 13.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection
Exhibit 14 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 14 is an internal SaveOnSP slide deck containing information about SaveOnSP's business practice and strategy, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 14.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection
Exhibit 15 to Letter Dated September 26, 2024 [ECF No. 391]	Exhibit 15 is an excerpt of a Microsoft Teams chat between SaveOnSP employees, discussing SaveOnSP's business practices for communicating with patients, comprising proprietary business information. <i>See</i> ECF No. 391 at Ex. 15.	If relief is not granted, SaveOnSP would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOnSP's proprietary business information.	No	No objection